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FROM: W. Caffey Norman, III

DATE: October 4, 1996

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October 4, 1996

Charles N. Auer
Director
Chemical Control Division
Office of Pollution Prevention and Toxics
E513C
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460

Re: Proposed HAP Test Rule

Dear Mr. Auer:

As you know, on June 26 the Environmental Protection Agency (EPA) published a proposed test rule containing testing requirements for 21 hazardous air pollutants (HAPs). 61 Fed. Reg. 33178. In the notice, EPA solicited proposals for enforceable consent agreements (ECAs) to conduct pharmacokinetic conversions of available data by other routes to inhalation exposure, and requested that such proposals be submitted by October 24, 1996. The deadline for comments on the proposed test rule is December 23, 1996.

On October 2, EPA hosted a meeting to discuss issues relating to ECAs for pharmacokinetic modeling proposals. The HAP Task Force, which I represent, was pleased to have the opportunity to attend this meeting and make a presentation relating to 1,1,2-trichloroethane. The HAP Task Force may also be interested in developing a more limited proposal for ethylene dichloride (EDC). It would be very beneficial to us to have an additional 30 days in which to submit the proposal(s). In addition to the task of reviewing the existing literature and

PATTON BOGGS, L.L.P.

Charles N. Auer

October 4, 1996

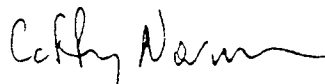
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available pharmacokinetic information, it would be useful to be able to obtain consensus within the participating companies and to discuss certain issues with EPA staff. A 30-day extension would provide sufficient time for these activities to take place and for a better developed proposal(s) to be submitted.

A corollary to our request for a 30-day extension of the deadline for submission of ECA proposals is an extension of the comment deadline itself by at least 30 days. I believe that both the public stakeholders and EPA itself will be better served by the opportunity at least to initiate a dialogue on the ECA proposals before having to prepare detailed comments addressing other issues. Indeed, it is possible that a number of issues that otherwise would be raised in comments and thus have to be considered by EPA staff could be resolved if sufficient time is provided between the submission of ECA proposals and the end of the comment period.

Please let me know if you would like for us to provide any additional information in connection with this request.

Sincerely,

A handwritten signature in dark ink, appearing to read "Caffey Norman", with a stylized flourish at the end.

W. Caffey Norman, III

cc: Gary E. Timm